



COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY

April 28, 2023

Via Hand Delivery

Honorable Gary R. Brown
United States District Court
100 Federal Plaza/Central Islip, New York 11722

Re *Frankie Valenti v. Police Commissioner Patrick J. Ryder, et al.*
19-CV-03990 (GRB)(LGD)

Your Honor:

This office represents Defendants in the above referenced action. Defendants have moved for summary judgment, and plaintiff has cross-moved for partial summary judgment. The parties have previously filed all motion papers on ECF.

Enclosed please find courtesy copies for Chambers of the following documents encompassing both defendants' motion, and plaintiff's cross-motion:

1. Defendants' Notice of Motion, Declaration of Ralph J. Reissman, and exhibits "A" through "Q"
2. Affidavit of Christopher V. Todd, Deputy Chief of the Nassau County Police Department's Legal Bureau, in support of Defendants' motion for summary judgment
3. Defendants' Rule 56.1 Statement of material undisputed facts in support of motion for summary judgment
4. Plaintiff's Rule 56.1 Counter Statement of Material Facts
5. Defendants' Memorandum of Law in support of motion for summary judgment
6. Plaintiff's Memorandum of Law in opposition to Defendants' Rule 56 motion for summary judgment, and in support of Plaintiff's Cross-Motion for partial summary judgment
7. Defendants' Reply Memorandum of Law in further support of defendants' motion for summary judgment, and in opposition to Plaintiff's Cross-Motion for summary judgment
8. Plaintiff's Notice of Cross-Motion for summary judgment, with exhibits "1" through "23", and Declaration of Neil Torczyner, Esq.
9. Plaintiff's Rule 56.1 Statement of Material Undisputed Facts

10. Defendants' Response to Plaintiff's Rule 56.1 Statement, with Counter Statement

11. Plaintiff's Reply Memorandum of Law in support of cross-motion for partial summary judgment

The parties thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman

RALPH J. REISSMAN

Deputy County Attorney

cc: Neil Torczyner, Esq.
Attorney for Plaintiff
w/out Enclosures